

## **Nonanoic Acid, Sulfonyl Ester-Comments of Environmental Defense**

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Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Nonanoic Acid, Sulfonyl Ester.

The test plan and robust summaries for nonanoic acid, sulfonyl ester (NOBS) were prepared by Procter and Gamble Company. The test plan is complete and we agree with the sponsor's conclusion that no additional studies are needed to fulfill the requirements of the HPV program. Our comments are based on a thorough review of the mammalian toxicity data and a limited review of the ecological and environmental fate data.

NOBS and several other structurally related n-alkanoyloxybenzene sulfonates (AOBS) are used primarily as bleach activators in laundry detergents, so these agents have the potential to result in environmental contamination, worker exposure and consumer exposure. Our comments on the test plan and robust summaries are provided below:

1. The sponsor provided extensive information on predicted environmental levels, worker exposure and consumer exposure. These sections are informative and we believe they make a very useful to the HPV program.
2. The sponsor, in several places in the test plan, included margin-of-exposure analyses to address product safety issues. While we do not necessarily disagree with the conclusions, we did not review these analyses because the intent of the HPV Challenge program is to enhance public availability of toxicity data and to identify data gaps that require additional studies not to conduct risk assessments or margin-of-exposure analyses.
3. The mammalian health data is generated using NOBS and other related AOBS (CS-ClO chain length). This is scientifically justifiable as the biological properties of the test substances should be very similar. Moreover, all of the AOBS used in these studies will generate the same major metabolite, namely hydroxybenzene sulfonate, which is rapidly conjugated and excreted in the urine.
4. The estimated NOEL for aquatic toxicity of NOBS is 92 ug/l. This compares to an estimated concentration of surface water of 16 ug/l from a manufacturing plant. Although not required under the HPV program, we suggest that environmental monitoring be conducted around the manufacturing plant to verify the predicted releases given the closeness of the estimated releases to the NOEL. Thank you for this opportunity to comment.

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